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July 8, 2020

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BY HAND DELIVERY and EMAIL

City of Knoxville
Attn: Charles W. Swanson, Esq.
City Law Director
400 Main Street, Suite 699
Knoxville, TN 37902

Email: cswanson@knoxvilletn.gov

Knoxville Police Department
Attn: Eve M. Thomas, Police Chief
and Investigator Robert Cook
800 Howard Baker Jr. Blvd.
Knoxville, TN 37915

Email: chiefofpolice@knoxvilletn.gov

Re: Our Client: Ann Ledford, mother and next of kin of Johnathan Binkley
Decedent: Johnathan Binkley; Date of Death: July 27, 2019

Dear Director Swanson, Chief Thomas, and Investigator Cook:

Our firm has been retained by Ann Ledford to investigate potential claims arising from the death of her son, Johnathan Binkley, while Mr. Binkley was in the custody of the Knox County Sheriff's Department on July 27, 2019. The Knoxville Police Department (led by Inv. Cook) investigated Mr. Binkley's death.

Given that the District Attorney's office has now closed its investigation into Mr. Binkley's death and given that the District Attorney's office has returned the information it reviewed concerning Mr. Binkley's death to KPD, I'm writing to request an opportunity to inspect all evidence, reports, documents, notes, videos, audios, emails, texts, voicemails, electronically stored information, records, data and information of any kind which exists concerning the pursuit, arrest, interactions with, and/or death of Mr. Binkley on July 27, 2019 (the "subject incident") as soon as possible, **as well as to request copies of all of that information as soon as copies can be made.**

Please contact me or Linda Carter in my office as soon as possible to advise when and where the inspection may be conducted and when copies will be available. Please also let me know the costs of copying the requested information. Further, if some of the materials may be copied and made available before others, please let us know and we'll pick up the copies which

are available until the remainder is copied. If any issue or question arises about how the copying may be expedited or about how any part of the materials may be copied in the most convenient manner, please do not hesitate to call me any time to discuss those matters.

Additionally, this letter requests that each of you, as well as each of your agents and employees, maintain the integrity of any and all evidence, reports, documents, notes, videos, audios, emails, texts, voicemails, electronically stored information, records, data and information of any kind pertaining to the pursuit, arrest, interactions with, and/or death of Mr. Binkley on July 27, 2019, and/or the transport of Mr. Binkley's body from the scene, any part of the investigation of the subject incident, any related act or omission of anyone involved in the subject incident (including but not limited to the female passenger who was riding with Mr. Binkley during the pursuit and the responding law enforcement and emergency medical personnel), the investigation of the subject incident, and the medical examination and autopsy performed on Mr. Binkley's body (the "subject information"). Please do not dispose, alter, modify, destroy or perform destructive testing on any part of the subject information prior to providing my office with a reasonable opportunity to inspect and copy it.

This preservation request necessarily includes, but is not limited to, any and all reports, incident reports, supplemental incident reports, autopsy reports, autopsy notes, witness statements, diagrams, recreations, reenactments, videotapes (whether from the deputies' body cameras, cruiser videos, or otherwise), audio tapes or files, photographs, fingerprint cards, dispatcher tapes and logs, activity reports, pursuit reports, affidavits of complaints, warrants, photographs of the scene and of anyone at the scene, field notes, daily activity logs, daily rosters, daily work schedules, policies, procedures, ambulance records or reports, medical entries, medical records, batons, flashlights, toxicology reports, memoranda, correspondence, autopsy photographs, slides, blood samples, tissue samples, organs, personal belongings of Mr. Binkley, alleged drugs and/or drug paraphernalia, insurance claim forms or documents, accident reconstruction reports, test results, officer's medical records or reports, employee statements or reports, repair bills, or any other evidence, records, documents or things pertaining to the subject incident and/or Mr. Binkley's death.

I am specifically requesting that all actions be taken as necessary to preserve all video, data, tapes, and all other recordings of any kind, as well as all other evidence of any kind or nature which may be recycled or recorded over, and that any such data, tapes and evidence be preserved and verified for accuracy.

If any evidence, data, or other items or information referenced herein has already been tested, inspected, altered, modified, destroyed, lost or changed in any manner, I am requesting that you identify with particularity the evidence, data, items or information that has or have been tested, inspected, modified, altered, destroyed, lost or changed in any manner and that you provide the name, address and telephone number of the person, persons, entity or entities involved in any

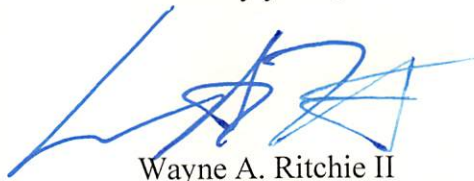
manner in such information being tested, altered, inspected, modified, destroyed, lost or changed. Further, do not do any further testing or destructive handling of any such information without notifying our office and giving us the opportunity to ensure that the information is preserved.

With regard to my request for copies of the information referenced above, please be advised that I am specifically requesting to inspect and copy (or have copied) the documents, videos, audio files, reports, data, electronically stored information and other information referenced herein (the original documents or data or copies or duplicates thereof if the originals are not available) pursuant to the Open Records Request pursuant T.C.A. §§ 10-7-501 *et seq.*, and in particular T.C.A. § 10-7-503.

Pursuant to the Public Records Act, I am requesting compliance with this letter no later than seven days from today and an estimation of the costs of copying / reproducing the requested information. If I do not receive a response in compliance with the Public Records Act, I will consider this a denial and will have no option but to file an action under the Public Records Act which seeks all available remedies.

Thank you in advance for your anticipated professional courtesies and attention to this matter. Kind regards.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Wayne A. Ritchie II', with a stylized, cursive script.

Wayne A. Ritchie II

WAR/lhc